

7000 Miller Court East, Norcross, GA 30071 United States

tel: 404.920.8510 fax: 404.920.8512

email: jmcgovern@mcgovernfirm.com

December 6, 2023

## Via ECF

Hon. Loretta A. Preska, USDJ United States District Court Southern District of New York 500 Pearl Street Room 2220 New York, NY 10007

Re: Manta Industries, Ltd. v. Paul P. Law, et al., Case No. 16-cv-8308

Response To Order Entered November 30, 2023

## Dear Judge Preska:

I represent Plaintiff Manta Industries, Ltd. I am responding to your order entered November 30, 2023, [Doc. 139], concerning dismissing Defendant Jonathan Anand from the lawsuit.

Plaintiff filed a motion requesting this Court's permission to amend its second amended complaint by dropping Mr. Anand from the lawsuit. [Doc. 142]. Counsel for Defendants Jonathan Anand, Yogesh Anand, and Kum Casanova told me he consents to this Court allowing the motion. Conversely, counsel for Defendants Paul Law and Lourdes Law told me he would not consent to allowing the motion. Therefore I could not submit a consent order.

Now, there are two unruled upon motions for Rule 37 sanctions filed by Plaintiff. [Docs. 75-77, 109-113].

Sincerely,

John M. McGovern

Cc: Satish Kumar Bhatia, Esq. Chi-Yuan Hwang, Esq.

M. M. Yourn